## IN THE

## Supreme Court of the United States

UNITED STATES OF AMERICA,

Petitioner,

v.

MICHAEL ANDREW GARY,

Respondent.

On Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit

## **BRIEF FOR RESPONDENT**

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 13,831 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 18, 2021.

Colin Casey Hogan

Wilson-Epes Printing Co., Inc.